

(51)

RF

6-1-01

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PAUL LEE,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendants.

) 1:00cv00486

FILED
SCRANTON

MAY 31 2001

PER VJ
DEPUTY CLERK

DECLARATION OF PAUL LEE IN OPPOSITION
TO MOTION TO STRIKE BRIEF

I, Paul Lee, declare and state under the penalty for perjury that the following is true and correct (28 USC 1746):

1. I have reviewed the government's motion to strike. The allegations therein are unfounded and are meant to harass.
2. Every document I submitted has been signed in accordance with F.R.Cv.P. 11.
3. The document with a "/s/" only appeared on the government's copy. The document I submitted to the Clerk was signed. The "/s/" denotes that the original was signed.
4. I use Chrissy's News and Paralegal Services to conduct research, typing, service, and mailing. They do not represent me. Rather, they only assist me with my litigation by offering the above referenced services.
5. I have been informed that the Office of the United States Attorney has engaged in a pattern of harassment relating to Chrissy's Paralegal Services. I have been informed that they attempt to interfere with the services rendered by refusing pleadings in cases pending before this Court such as in Latergaus v. Houser. This appears to be an ongoing attempt by the government to deny inmates access to the Courts.
6. Certainly, I can have any adult over eighteen mail my pleadings. Furthermore, I have a right to have copies made when prison officials impair my ability to do so. Stamp limitations require that I have outside parties serve my pleadings. My handwriting and difficulty typing requires that I use a typing service.
7. Therefore, the government's motion must be denied as malicious.

8. I will continue to sign my pleadings in accordance with F.R.Cv.P. 11 just as I did my brief. Any variance in writing is due to normal fluctuations of my signature and pain in my hands which requires that I sign with a different hand at times.

9. I also note that my papers are being delayed because the government is not serving me at the address on file with the Clerk in accordance with F.R.Cv.P. 5.

Respectfully submitted,

By: 

Paul Lee
% Chrissy's Paralegal Service
500 Lincoln Highway
N. Versailles, PA 15137
p.lee@usdoj.com

PLAINTIFF

CERTIFICATE OF SERVICE

I, Paul Lee, certify that I mailed a true copy of the foregoing to Kate L. Mershimer, Esquire; Office of U.S. Attorney; 217 Federal Building; 225 Walnut Street; Box 11754; Harrisburg, PA 17108 on this 23 day of May, 2001.

By: 

Paul Lee